

EXHIBIT P

## CERTIFIED COPY

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

LARGO CONCRETE, INC., A CALIFORNIA )  
CORPORATION; N.M.N. CONSTRUCTION, INC., )  
A CALIFORNIA CORPORATION, )  
PLAINTIFFS, )  
V. ) NO. C07-04651 CRB (ADR)  
LIBERTY MUTUAL FIRE INSURANCE COMPANY, A )  
MASSACHUSETTS CORPORATION, AND DOES 1 )  
THROUGH 100, INCLUSIVE, )  
DEFENDANTS. )

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**DEPOSITION OF: LISA HANSEN**  
**TAKEN: TUESDAY, NOVEMBER 27, 2007**

*Dalene Court Reporters*

*16161 Ventura Boulevard, #734  
Encino, California 91436  
Telephone: 661.726.0584*

*Reported By:  
Magdalene S. Puente*

*CSR 8498*



## UNITED STATES DISTRICT COURT

## NORTHERN DISTRICT OF CALIFORNIA

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5 LARGO CONCRETE, INC., A CALIFORNIA )  
6 CORPORATION; N.M.N. CONSTRUCTION, )  
7 INC., A CALIFORNIA CORPORATION, )  
8 PLAINTIFFS )  
9 ) CASE NO.  
10 V. ) C07-04651 CRB (ADR)  
11 LIBERTY MUTUAL FIRE INSURANCE )  
12 COMPANY, A MASSACHUSETTS )  
13 CORPORATION, AND DOES 1 THROUGH )  
14 100, INCLUSIVE, )  
15 DEFENDANTS. )  
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16 DEPOSITION OF LISA HANSEN, TAKEN  
17 ON BEHALF OF THE PLAINTIFF, AT  
18 5820 CANOGA AVENUE, SUITE 250,  
19 WOODLAND HILLS, CALIFORNIA, COMMENCING  
20 AT 1:07 P.M., TUESDAY, NOVEMBER 27, 2007,  
21 BEFORE MAGDALENE S. PUENTE, CSR 8498.

1 APPEARANCES OF COUNSEL:

2  
3 FOR THE PLAINTIFFS:

4 ROXBOROUGH, POMERANCE & NYE, LLP  
5 BY: NICHOLAS P. ROXBOROUGH, ESQ.  
6 5820 CANOGA AVENUE  
7 SUITE 250  
8 WOODLAND HILLS, CALIFORNIA 91367  
9 818.992.9999

10 FOR THE DEFENDANTS:

11 GRACE, COSGROVE & SCHIRM  
12 A PROFESSIONAL CORPORATION  
13 BY: DAVID K. SCHULTZ, ESQ.  
14 444 SOUTH FLOWER STREET  
15 SUITE 1100  
16 LOS ANGELES, CALIFORNIA 90071  
17 213.533.5400

18 SHEPPARD, MULLIN, RICHTER & HAMPTON, LLP  
19 BY: SCOTT R. SVESLOSKY, ESQ.  
20 333 SOUTH HOPE STREET  
21 48TH FLOOR  
22 LOS ANGELES, CALIFORNIA 90071-1448  
23 213.620.1780

24 ALSO PRESENT:

25 MICHAEL L. PHILLIPS, ESQ.

1 REMEDYTEMP CASE; RIGHT? 01:32:11

2 A. NO. I'M NOT -- 01:32:17

3 I CAN PROBABLY ANSWER THIS BUT NOT MUCH MORE. 01:32:19

4 I THINK THIS IS GETTING INTO WORK PRODUCT. 01:32:21

5 AT TIMES IT WAS SHARED. AT TIMES IT WAS NOT. 01:32:23

6 Q. OKAY. YOU DIDN'T GIVE ANY TRAINING TO CRAIG 01:32:30

7 PYNES ON WORKERS' COMP BAD FAITH CASES, OBVIOUSLY, DID 01:32:58

8 YOU? 01:32:59

9 A. DID I PERSONALLY? 01:32:59

10 Q. YES. 01:33:01

11 A. WELL, I SPOKE WITH MR. PYNES IN GENERAL ABOUT 01:33:02

12 AN ASSIGNMENT THAT HE DID ON TONY'S FINE FOODS CASE, SO 01:33:08

13 I WOULD CONSIDER QUESTIONS THAT HE HAD ASKED ME AND 01:33:11

14 ISSUES WE HAD DISCUSSED ABOUT THE ASSIGNMENT HE HAD 01:33:16

15 WITH TONY'S FINE FOODS AS TRAINING. 01:33:19

16 Q. OKAY. WELL, I'M NOT GOING TO ARGUE WITH YOU 01:33:23

17 ABOUT THAT. WE'LL COME BACK TO THAT. 01:33:27

18 BUT OTHER THAN THAT, YOU DIDN'T GIVE ANY 01:33:29

19 TRAINING TO CRAIG PYNES; RIGHT? 01:33:30

20 MR. SCHULTZ: OBJECTION; OVERBROAD, VAGUE. 01:33:32

21 BY MR. ROXBOROUGH: 01:33:34

22 Q. CONCERNING WORKERS' COMPENSATION BAD FAITH 01:33:35

23 CASES? 01:33:39

24 A. BEYOND WHAT I TESTIFIED TO, I DID NOT 01:33:39

25 PERSONALLY, NO. 01:33:41

1 FOODS, DID YOU? YOU WEREN'T EVEN THE HANDLING  
 2 ATTORNEY.

01:47:11

01:47:14

3 MR. SCHULTZ: OBJECTION; MISSTATES HER  
 4 TESTIMONY.

01:47:14

01:47:16

5 THE DEPONENT: WELL, AS I TESTIFIED, HE DID  
 6 COME AND ASK ME SOME QUESTIONS ABOUT THE ASSIGNMENT  
 7 THAT HE WAS GIVEN. SO TO THE EXTENT I WOULD HAVE  
 8 PROVIDED SOME GUIDANCE, RECOMMENDATIONS, INFORMATION OR  
 9 HELP, THAT'S SUPERVISION.

01:47:17

01:47:21

01:47:24

01:47:28

01:47:35

10 BY MR. ROXBOROUGH:

11 Q. THAT'S WHAT YOU MEANT BY "SUPERVISE HIM"?

01:47:37

12 A. WELL, THAT'S INVOLVED IN SUPERVISION.

01:47:40

13 Q. SO YOU WERE INVOLVED IN SUPERVISING HIM ON  
 14 THIS ASSIGNMENT INVOLVING WORKERS' COMPENSATION CLAIM  
 15 FILES; IS THAT YOUR TESTIMONY?

01:47:42

01:47:45

01:47:50

16 MR. SCHULTZ: OBJECTION; ARGUMENTATIVE, VAGUE,  
 17 COMPOUND, MISSTATES HER TESTIMONY. TESTIMONY STANDS AS  
 18 SHE TESTIFIED.

01:47:51

01:47:53

01:47:58

19 THE DEPONENT: WHILE AT KERN AND WOOLEY I WAS  
 20 ONE OF THE SUPERVISING ATTORNEYS FOR OUR PRACTICE GROUP  
 21 AND OFTEN WOULD SUPERVISE MR. PYNES AND OTHERS ON A  
 22 VARIETY OF CASES.

01:48:02

01:48:05

01:48:11

01:48:16

23 BY MR. ROXBOROUGH:

24 Q. HE WAS A COMPETENT LAWYER?

01:48:19

25 A. PARDON?

01:48:20

1 Q. HE WAS A COMPETENT LAWYER? 01:48:21

2 MR. SCHULTZ: OBJECTION; VAGUE. 01:48:23

3 THE DEPONENT: YEAH. SURE. 01:48:24

4 BY MR. ROXBOROUGH: 01:48:24

5 Q. GOOD LAWYER? 01:48:26

6 MR. SCHULTZ: SAME. 01:48:28

7 THE DEPONENT: YES. 01:48:29

8 BY MR. ROXBOROUGH: 01:48:29

9 Q. HARD WORKER? 01:48:29

10 A. YES. 01:48:30

11 Q. HONEST? 01:48:31

12 A. I HAVE NO REASON TO BELIEVE OTHERWISE. 01:48:32

13 Q. THIS SUPERVISION OF CRAIG PYNES ON TONY'S FINE 01:48:42

14 FOODS, WHAT WOULD YOU ESTIMATE THE LENGTH OF THE TIME 01:48:45

15 YOU SPENT SUPERVISING HIM ON THIS ASSIGNMENT? 01:48:47

16 A. MY DISCUSSION WITH HIM WOULD HAVE BEEN, AS I 01:48:51

17 SIT HERE TODAY, AN ESTIMATE OF 15 MINUTES. 01:48:59

18 Q. AND HOW IS IT THAT YOU RECALL THAT SO VIVIDLY? 01:49:05

19 MR. SCHULTZ: OBJECTION; ARGUMENTATIVE. 01:49:09

20 THE DEPONENT: I HAVE A RECOLLECTION THAT 01:49:14

21 MR. PYNES WALKED INTO MY OFFICE, WAS STANDING IN MY 01:49:18

22 OFFICE, AND HAD ASKED ME QUESTIONS ABOUT THE 01:49:22

23 ASSIGNMENT, THE PROJECT THAT HE WAS WORKING ON IN THE 01:49:27

24 TONY'S FINE FOODS CASE AND ASKED ME SOME SPECIFIC 01:49:33

25 QUESTIONS EITHER ABOUT THE DOCUMENT REVIEW, THE 01:49:38

1	ASSIGNMENT, OR ISSUES INVOLVING THE WORKERS' COMP BAD	01:49:42
2	FAITH.	01:49:50
3	<b>BY MR. ROXBOROUGH:</b>	01:50:12
4	Q. WELL, DID HE ASK YOU ABOUT THE DOCUMENT REVIEW	01:50:13
5	OR DID HE ASK YOU ABOUT THE ASSIGNMENT OR DID HE ASK	01:50:15
6	YOU ABOUT THE ISSUES INVOLVING THE WORKERS' COMP BAD	01:50:17
7	FAITH CASE?	01:50:20
8	MR. SCHULTZ: OBJECTION; COMPOUND.	01:50:20
9	<b>BY MR. ROXBOROUGH:</b>	01:50:25
10	Q. WHICH ONE DID HE ASK YOU ABOUT?	01:50:26
11	MR. SCHULTZ: OBJECTION; COMPOUND.	01:50:27
12	THE DEPONENT: AS I SIT HERE TODAY, IT WAS	01:50:32
13	ABOUT THE ASSIGNMENT IN GENERAL WHICH ENCOMPASSED ALL	01:50:34
14	OF THOSE.	01:50:38
15	I DON'T RECALL ANY -- ANY OF THE SPECIFICS IN	01:50:41
16	TERMS OF WHAT HE SAID AND WHAT I SAID, BUT I DO	01:50:51
17	DISTINCTLY REMEMBER THAT CRAIG AND I DID DISCUSS THAT	01:50:57
18	PROJECT.	01:51:00
19	<b>BY MR. ROXBOROUGH:</b>	01:51:00
20	Q. BUT YOU DON'T REMEMBER WHICH OF THE THREE	01:51:01
21	SUBJECTS YOU TALKED ABOUT?	01:51:04
22	MR. SVESLOSKY: OBJECTION; MISSTATES HER	01:51:06
23	TESTIMONY, ARGUMENTATIVE.	01:51:08
24	MR. SCHULTZ: VAGUE AND COMPOUND, TOO.	01:51:11
25	THE DEPONENT: I THINK I ANSWERED THAT.	01:51:13

1 BY MR. ROXBOROUGH: 01:51:15

2 Q. DID YOU TAKE NOTES OF THE CONVERSATION? 01:51:15

3 A. NO. 01:51:17

4 Q. YOU HAD NEVER WORKED WITH HIM ON TONY'S FINE 01:51:19

5 FOODS UP UNTIL THAT POINT; CORRECT? 01:51:22

6 A. CORRECT. 01:51:25

7 Q. YOU DIDN'T EVEN GIVE HIM THE ASSIGNMENT, DID 01:51:26

8 YOU? 01:51:32

9 A. NO, I DID NOT. 01:51:32

10 Q. WHAT MONTH WAS THIS? 01:51:36

11 A. I DON'T RECALL AS I SIT HERE TODAY. 01:51:40

12 Q. WHAT YEAR WAS IT? 01:51:43

13 A. WELL, IT WAS DURING THE TIME HE WAS EMPLOYED 01:51:45

14 AT KERN AND WOOLEY, SO IT WAS EITHER THE FALL OF 2003 01:51:48

15 OR BEFORE HE LEFT IN JANUARY, FEBRUARY, MARCH OF 2004. 01:51:54

16 MR. ROXBOROUGH: I'M GOING TO HAVE MARKED AS 01:52:02

17 EXHIBIT 2 YOUR DECLARATION CALLED AN AFFIDAVIT IN THE 01:52:04

18 REPUBLIC SERVICES VERSUS LIBERTY MUTUAL CASE. 01:52:13

19 (WHEREUPON, PLAINTIFF'S EXHIBIT 2 WAS MARKED 01:52:13

20 FOR IDENTIFICATION AND WAS ATTACHED HERETO.) 01:52:13

21 BY MR. ROXBOROUGH: 01:52:13

22 Q. YOU'RE FAMILIAR WITH THIS DOCUMENT; CORRECT? 01:52:47

23 A. YES. 01:52:50

24 Q. YOU SIGNED IT ON AUGUST 1ST OF 2006; CORRECT? 01:52:54

25 A. THAT'S WHAT IT SAYS ON PAGE FOUR. 01:52:59

1 Q. YOU DIDN'T MENTION ONE WORD ABOUT ANYTHING YOU 01:53:03  
2 JUST TESTIFIED -- STRIKE THAT. 01:53:06

3 YOU DIDN'T EVEN MENTION THE CASE THAT YOU HAD 01:53:08  
4 ANY INVOLVEMENT IN ON TONY'S FINE FOODS IN THIS 01:53:11  
5 DECLARATION; CORRECT? 01:53:13

6 MR. SCHULTZ: ARGUMENTATIVE. 01:53:14

7 THE DEONENT: WELL -- 01:53:15

8 MR. SCHULTZ: VAGUE. 01:53:16

9 BY MR. ROXBOROUGH: 01:53:17

10 Q. IS THAT TRUE? 01:53:18

11 A. CORRECT. AND IT'S COVERED IN MY DEPOSITION IN 01:53:23  
12 THE KENTUCKY SUIT. 01:53:27

13 Q. WHY DIDN'T YOU MENTION ANYTHING ABOUT YOU 01:53:27  
14 SUPERVISING MR. PYNES ON TONY'S FINE FOODS ON 01:53:32  
15 AUGUST 1ST OF 2006? 01:53:36

16 A. WELL, AS I TESTIFIED IN MY PRIOR DEPOSITION IN 01:53:37  
17 THE KENTUCKY LAWSUIT, AS OF THE TIME I SIGNED THIS 01:53:41  
18 DECLARATION, I DID NOT RECALL SPECIFICS RELATING TO 01:53:45  
19 TONY'S FINE FOODS. 01:53:59

20 HOWEVER, BETWEEN THE TIME I SIGNED THIS 01:54:00  
21 DECLARATION AND THEN MY DEPOSITION WAS NOTICED BY YOUR 01:54:02  
22 FIRM, IN PREPARING FOR THAT DEPOSITION, MY RECOLLECTION 01:54:06  
23 WAS REFRESHED THAT MR. PYNES HAD WORKED ON THE TONY'S 01:54:10  
24 FINE FOODS CASE. 01:54:17

25 AND ONCE MY RECOLLECTION WAS REFRESHED, IT 01:54:20

1 ALSO REFRESHED MY RECOLLECTION OF HIM SPECIFICALLY 01:54:24  
2 DISCUSSING THE WORK THAT HE DID ON THAT CASE WITH ME. 01:54:27  
3 Q. OKAY. WHO REFRESHED YOUR MEMORY? 01:54:31  
4 WAS IT BILL CUPELO I BELIEVE YOU SAID? 01:54:34  
5 MR. SCHULTZ: OBJECTION; ASSUMES FACTS NOT IN 01:54:37  
6 EVIDENCE. 01:54:39  
7 THE DEPONENT: WELL, I BELIEVE I TESTIFIED TO 01:54:39  
8 THIS IN MY PRIOR DEPOSITION. IT WAS OTHER ATTORNEYS 01:54:41  
9 WITHIN AT THAT TIME THE PETERSON & BRADFORD LAW FIRM. 01:54:43  
10 BY MR. ROXBOROUGH: 01:54:47  
11 Q. WHO WERE THE OTHER ATTORNEYS? 01:54:47  
12 A. WELL, I BELIEVE AS I TESTIFIED PREVIOUSLY, IT 01:54:58  
13 WOULD HAVE BEEN ANY OF THEM INDIVIDUALLY OR IN 01:55:01  
14 COMBINATION RON SKOCYPEC, SUSAN OLSON, AND MELODEE YEE. 01:55:07  
15 Q. SO PRIOR TO THE -- 01:55:12  
16 SO IS IT FAIR TO SAY THAT PRIOR TO 01:55:15  
17 AUGUST 1ST, 2006, YOU DIDN'T RECALL THE CONVERSATION 01:55:16  
18 THAT YOU TESTIFIED TO REGARDING TONY'S FINE FOODS WITH 01:55:20  
19 CRAIG PYNES? 01:55:23  
20 MR. SVESLOSKY: OBJECTION; MISSTATES HER 01:55:26  
21 TESTIMONY, LACKS FOUNDATION. 01:55:28  
22 THE DEPONENT: WHEN I SIGNED THIS DECLARATION 01:55:30  
23 ON AUGUST 1ST, 2006, I DID NOT RECALL MR. PYNES' WORK 01:55:32  
24 ON TONY'S FINE FOODS. 01:55:38  
25 /// 01:55:39

1 BY MR. ROXBOROUGH:

2 Q. OKAY. AND SO WHAT DID MS. OLSON TELL YOU

3 ABOUT CRAIG PYNES'S WORK ON TONY'S FINE FOODS?

4 A. WELL, THAT'S WORK PRODUCT.

5 Q. I DON'T THINK SO, NOT IF THAT'S WHAT YOU'RE

6 RELYING ON TO REFRESH YOUR RECOLLECTION.

7 YOU REMEMBER THE EVIDENCE CODE?

8 MR. SCHULTZ: OH. WAIT. LET'S NOT GET

9 ARGUMENTATIVE LIKE THAT, OKAY?

10 MR. ROXBOROUGH: YOU KNOW, MR. SCHULTZ --

11 MR. SCHULTZ: THERE'S NO LECTURE ABOUT DO YOU

12 REMEMBER THE EVIDENCE CODE, OKAY?

13 MR. ROXBOROUGH: I'M NOT GOING TO SIT HERE AND

14 LISTEN TO MANY MORE ATTORNEY WORK PRODUCT OBJECTIONS,

15 OKAY?

16 MR. SCHULTZ: I DON'T CARE WHAT YOU DO.

17 THERE'S NOT GOING TO BE ANYMORE OF THAT, OKAY, AND I'M

18 NOT GOING TO SIT HERE AND LISTEN TO THAT EITHER.

19 MR. ROXBOROUGH: YOU'RE FREE TO LEAVE ANYTIME

20 YOU'D LIKE.

21 MR. SCHULTZ: AS ARE YOU.

22 MR. ROXBOROUGH: NO. THIS IS MY OFFICE.

23 KNOCK IT OFF.

24 MR. SCHULTZ: YOU KNOCK IT OFF. I'M SERIOUS.

25 MR. ROXBOROUGH: YOU KNOW WHAT, MS. HANSEN, DO

01:55:39

01:55:39

01:55:57

01:55:57

01:56:04

01:56:06

01:56:08

01:56:09

01:56:11

01:56:13

01:56:13

01:56:15

01:56:16

01:56:19

01:56:22

01:56:23

01:56:25

01:56:28

01:56:30

01:56:31

01:56:31

01:56:33

01:56:35

01:56:38

1 YOU NEED TO HAVE THE QUESTION READ BACK? 01:56:42

2 THE DEPONENT: YES. 01:56:47

3 MR. ROXBOROUGH: OKAY. WHY DON'T YOU PLEASE 01:56:48  
4 READ BACK THE QUESTION? 01:56:50

5 (WHEREUPON, THE FOLLOWING QUESTION 01:56:50

6 WAS READ: 01:56:50

7 Q. AND SO WHAT DID MS. OLSON TELL 01:56:50  
8 YOU ABOUT CRAIG PYNES'S WORK ON TONY'S 01:56:50  
9 FINE FOODS?) 01:56:51

10 THE DEPONENT: WELL, I DON'T KNOW THAT SHE 01:56:51  
11 TOLD ME ABOUT THE WORK. AND AS I SIT HERE TODAY, I 01:57:08  
12 DON'T RECALL SPECIFICALLY WHAT SHE AND I WOULD HAVE 01:57:12  
13 DISCUSSED BETWEEN THE TIME I SIGNED MY AFFIDAVIT IN THE 01:57:18  
14 KENTUCKY LAWSUIT AND THE TIME OF MY DEPOSITION. 01:57:22

15 BY MR. ROXBOROUGH: 01:57:22

16 Q. WHAT DID YOU AND MS. YEE TALK IN TERMS OF 01:57:25  
17 CRAIG PYNES'S INVOLVEMENT, IF ANYTHING, AND IF YOU 01:57:28  
18 RECALL? 01:57:33

19 MR. SCHULTZ: OBJECTION; VAGUE AS TO SCOPE, 01:57:33  
20 TIME, COMPOUND. 01:57:37

21 GO AHEAD. 01:57:39

22 THE DEPONENT: AS I SIT HERE TODAY, I BELIEVE 01:57:49  
23 THAT I DISCUSSED WITH MS. YEE WHO I THEN REMEMBERED WAS 01:57:52  
24 ONE OF THE ATTORNEYS ON TONY'S FINE FOODS IN GENERAL 01:58:00  
25 WHAT THE CASE WAS ABOUT, WHETHER CRAIG WORKED ON THE 01:58:08

1 CASE, AND WHAT THE SCOPE OF ANY ASSIGNMENTS OR PROJECTS 01:58:15  
2 WERE THAT HE DID ON THE CASE WHILE AT KERN AND WOOLEY. 01:58:22  
3 BY MR. ROXBOROUGH: 01:58  
4 Q. WAS THIS WHILE YOU WERE AT THE PETERSON LAW 01:58:  
5 FIRM? 01:58:21  
6 A. YES. 01:58:25  
7 Q. AND THIS WAS AT THE PETERSON LAW FIRM, THIS 01:58:29  
8 DISCUSSION? 01:58:32  
9 A. YES. 01:58:33  
10 Q. WHY DIDN'T YOU TALK TO HER ABOUT THIS BEFORE 01:58:40  
11 YOU SIGNED YOUR AUGUST 1ST, 2006 DECLARATION? 01:58:43  
12 MR. SVESLOSKY: OBJECTION; LACKS FOUNDATION, 01:58:48  
13 CALLS FOR SPECULATION, VAGUE. 01:58:51  
14 THE DEPONENT: SHE MIGHT HAVE BEEN ON 01:59:13  
15 VACATION. SHE TYPICALLY TAKES A VACATION AT THE END OF 01:59:16  
16 JULY, THE BEGINNING OF AUGUST, SO I -- AS I SIT HERE 01:59:20  
17 TODAY, I BELIEVE AT THE TIME I SIGNED THIS DECLARATION 01:59:25  
18 SHE WAS ON VACATION, AND THAT AFTER I SIGNED THIS 01:59:28  
19 DECLARATION SHE CAME BACK FROM VACATION AND I RECEIVED 01:59:32  
20 A SUBPOENA FOR MY DEPOSITION. 01:59:35  
21 BY MR. ROXBOROUGH: 01:59:35  
22 Q. AND SO IN PREPARING FOR YOUR DEPOSITION IN THE 01:59:38  
23 KENTUCKY CASE, YOU SPOKE TO MS. YEE? 01:59:42  
24 A. YES. 01:59:45  
25 Q. ARE YOU ABSOLUTELY CERTAIN ABOUT THAT? 01:59:51

1 A. YES.

01:59:52

2 Q. OKAY. DO YOU RECALL TESTIFYING IN YOUR  
3 AUGUST 15TH, 2006 DEPOSITION THAT MS. OLSON HELPED --  
4 STRIKE THAT.

01:59:54

02:01:

02:01:2

5 DO YOU RECALL TESTIFYING IN YOUR AUGUST 15TH,  
6 2006 DEPOSITION THAT MS. OLSON PARTICIPATED IN THE  
7 DRAFTING OF YOUR KENTUCKY DECLARATION?

02:01:28

02:01:32

02:01:37

8 MR. SCHULTZ: OBJECTION; VAGUE, ASSUMES FACTS  
9 NOT IN EVIDENCE.

02:01:43

02:01:43

10 IF YOU'D LIKE TO SHOW HER FROM HER DEPOSITION,  
11 GO FOR IT.

02:01:47

02:01:51

12 DO YOU NEED TO SEE --

02:01:53

13 THE DEPONENT: I'D HAVE TO SEE THE DEPOSITION  
14 TO MAKE SURE WHAT I SAID AND WHAT THE TESTIMONY WAS.

02:01:55

02:01:56

15 MR. ROXBOROUGH: OKAY. NOT A PROBLEM.

02:01:59

16 MARKED AS EXHIBIT 3 THE DEPOSITION I WAS  
17 REFERRING TO, AND I'LL DIRECT YOUR ATTENTION TO PAGE  
18 20, LINES TWO THROUGH EIGHT.

02:02:05

02:02:10

02:02:17

19 (WHEREUPON, PLAINTIFF'S EXHIBIT 3 WAS MARKED  
20 FOR IDENTIFICATION AND WAS ATTACHED HERETO.)

02:02:17

02:02:17

21 BY MR. ROXBOROUGH:

02:02:17

22 Q. THIS IS THE DEPOSITION YOU REVIEWED TODAY;  
23 CORRECT?

02:02:51

02:02:53

24 A. I'M SORRY. COULD YOU REPEAT?

02:02:55

25 Q. THIS IS A TRUE AND CORRECT COPY OF THE

02:02:57

1 STATE OF CALIFORNIA )  
2 ) SS.  
3 COUNTY OF LOS ANGELES )

4 I, MAGDALENE S. PUENTE, CERTIFIED SHORTHAND  
5 REPORTER, CERTIFICATE NUMBER 8498, FOR THE STATE OF  
6 CALIFORNIA, HEREBY CERTIFY:

7 THE FOREGOING PROCEEDINGS WERE TAKEN BEFORE ME  
8 AT THE TIME AND PLACE THEREIN SET FORTH, AT WHICH TIME  
9 THE DEPONENT WAS PLACED UNDER OATH BY ME;

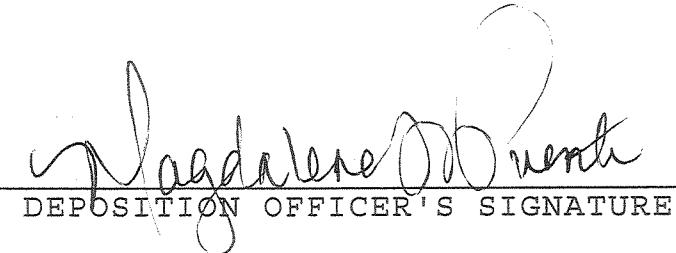
10 THE TESTIMONY OF THE DEPONENT AND ALL  
11 OBJECTIONS MADE AT THE TIME OF THE EXAMINATION WERE  
12 RECORDED STENOGRAPHICALLY BY ME AND WERE THEREAFTER  
13 TRANSCRIBED.

14 THE FOREGOING TRANSCRIPT IS A TRUE AND CORRECT  
15 TRANSCRIPT OF MY SHORTHAND NOTES SO TAKEN;

16 I FURTHER CERTIFY THAT I AM NEITHER COUNSEL  
17 FOR NOR RELATED TO ANY PARTY TO SAID ACTION NOR IN ANY  
18 WAY INTERESTED IN THE OUTCOME THEREOF.

19 IN WITNESS WHEREOF, I HAVE HEREUNTO SUBSCRIBED  
20 MY NAME THIS 3rd DAY OF December, 2007.

21  
22  
23  
24  
25



DEPOSITION OFFICER'S SIGNATURE